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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

**PURPLE INNOVATION, LLC, A
Delaware limited liability company,**

Plaintiff,

v.

**HONEST REVIEWS, LLC, a Florida
Corporation, RYAN MONAHAN, an
individual, and GHOSTBED, INC., a
Delaware corporation,**

Defendants.

**PLAINTIFF'S MOTION TO FOR LEAVE
TO FILE UNDER SEAL EXHIBIT 2 to
PLAINTIFF'S REPLY IN SUPPORT OF
MOTION FOR SANCTIONS**

Case No.: 2:17-cv-00138-DB

Honorable Dee Benson

Plaintiff Purple Innovation, LLC ("Plaintiff" or "Purple"), by and through its counsel of record MAGLEBY CATAXINOS & GREENWOOD, respectfully moves the Court for leave to filed under seal Exhibit 2 to Plaintiff's Reply in Support of Motion for Sanctions.

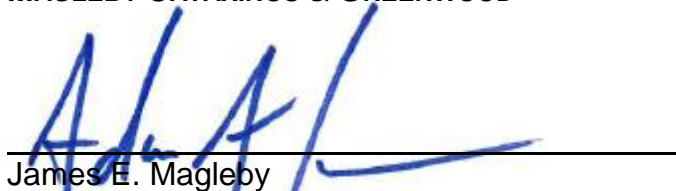
Exhibit 2 is a compilation of emails produced by third-party Achieve Agency ("Achieve") in response to a subpoena from Purple, and two documents produced by Defendant GhostBed, Inc ("GhostBed"). Both Achieve and GhostBed have designated

their respective documents in the compilation as “CONFIDENTIAL” under the terms of the Court’s Standard Protective Order. Accordingly, to honor Achieve’s and GhostBed’s designations, Purple seeks leave to file its Exhibit 2 conventionally and under seal.

A proposed order is filed concurrently with this motion.

DATED this 11th day of December, 2017.

MAGLEBY CATAXINOS & GREENWOOD

A handwritten signature in blue ink, appearing to read 'A. Alba', is written over a horizontal line.

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Adam Alba

Attorneys for Plaintiff Purple Innovation, LLC

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the law firm of MAGLEBY CATAXINOS & GREENWOOD, 170 South Main Street, Suite 1100, Salt Lake City, Utah 84101, and that, pursuant to Rule 5 of the Federal Rules of Civil Procedure, I served a true and correct copy of the foregoing **PLAINTIFF'S MOTION TO FOR LEAVE TO FILE UNDER SEAL EXHIBIT 2 to PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR SANCTIONS** upon the following via CM/ECF System this 11th day of December, 2017:

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